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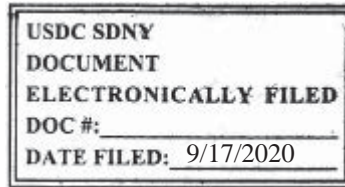
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September 14, 2020

VIA ECF
Hon. Alison Nathan, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

> The parties are ordered to submit a joint status letter within one week of the Second Circuit's decision in *Calcano v. Swarovski North America Ltd.*, 2d Cir. Case No. 20-1552.

[signature]
9/16/2020

      Re: *Emanuel Delacruz vs. Ralph Lauren Corporation*
              Case No. 1:19-cv-10198-AJN

Dear Judge Nathan:

The undersigned represents Defendant Ralph Lauren Corporation ("Defendant") in the above-referenced matter. Pursuant to Your Honor's Order dated September 10, 2020 (Dkt. No. 15) I write, with the consent of counsel for Plaintiff Emanuel Delacruz, to respectfully request that this matter be stayed pending the resolution of the Second Circuit appeal in the matter of Calcano v. Swarovski North America, Ltd., Case No. 20-1552 (the "Swarovski Appeal").

SO ORDERED

The Swarovski Appeal concerns identical claims as those asserted in this case. The decision in the Swarovski Appeal will therefore have a significant impact on this case, as it will help clarify and possibly narrow the issues in the matter and also help the parties determine how to move forward. Therefore, staying this matter pending the resolution of Swarovski Appeal is in the interest of judicial economy and will help conserve both the parties' and the Court's time and resources. A stay was entered for similar reasons in many other cases pending before the Southern District of New York in which identical claims were asserted.

We appreciate Your Honor's consideration of this request, and thank the Court for its time and attention to this matter.

                 Respectfully submitted

                     /s/ Sean J. Kirby
                 Sean J. Kirby

cc: All counsel of record (via ECF)